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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

IN RE: STEVEN MARK PETRY DEBTOR(S) CASE NO. 20-04730-JJG-13

TRUSTEE'S OBJECTION TO CONFIRMATION

Comes now, Ann M. DeLaney, Trustee herein, and objects to confirmation of the debtor's plan dated 08/20/2020 for the following reason (s):

- 1. Estimated 2019 figure on Internal Revenue Services Proof of Claim needs resolved.
- 2. Need Motion to Avoid Lien of Mariner Finance.
- 3. Need amended plan to pay homeowners association arrears and Marion County Treasurer through plan as well as funding the plan.
- 4. Debtor is delinquent in plan payments to the Trustee.

WHEREFORE, after notice and hearing, your Trustee requests the Court enter an order sustaining this objection and ordering an amended plan.

Respectfully submitted,

DATE: January 12, 2021

/s/Ann DeLaney Ann DeLaney P.O. Box 441285 Indianapolis, IN 46244 Telephone: (317) 829-7360 Facsimile: (317) 829-7369

Email:anndelaney341@trustee13.com

Certificate of Service

I do hereby certify that a copy of the foregoing Trustee's Objection to Confirmation has been duly served upon the following individuals, by United States mail, first-class postage prepaid, on this date January 12, 2021:

U.S. Trustee *via electronic mail*

LAW OFFICES OF MARK S ZUCKERBERG via electronic mail

STEVEN MARK PETRY: 1638 WELLESLEY COURT, INDIANAPOLIS, IN 46219-

/s/Ann DeLaney Ann DeLaney